

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE: Gerald R. Galleshaw :
Debtor :
 :
DAVID C. FRAIOLI and NEW :
ENGLAND AUTO CENTER, INC. :
Plaintiffs : CASE NO: 15-11047
 :
V. :
 : CHAPTER 7
 :
GERALD R. GALLESHAW, : ADV. PRO. NO.: 15-01023
Defendant :

JOINT MOTION TO EXTEND TIME TO FILE PRE-TRIAL STATEMENT

Now comes Plaintiffs, David C. Fraioli and New England Auto Center, Inc. (collectively “Plaintiff”) and Defendant/Debtor, Gerald R. Galleshaw (“Defendant”), by its counsel, hereby moves this honorable Court to allow an extension of time to a joint pre-trial statement in accordance to the Scheduling Order that was entered by this Court on November 5, 2015. As grounds therefore, the parties have not had the opportunity to discuss said joint pre-trial statement and Defendant’s counsel has experienced an unexpected family tragedy. Further, the parties state that the within Motion is the first request for an extension of time with respect to filing the joint pre-trial statement.

Wherefore, the parties respectfully request that an extension of time up to one (1) month or a time that is convenient with this Court, be granted to allow the parties to submit a joint pre-trial statement.

04/08/2016 EXTENSION GRANTED TO 4/25/16

Diane Finkle

David C. Fraioli and
New England Auto Center, Inc.
By its Attorneys,

Gerald R. Galleshaw,
By his Attorney,

/s/ Ryanna T. Capalbo, Esq
Andrew R. Bilodeau, Esq.
Ryanna T. Capalbo, Esq.
Bilodeau Carden Capalbo, LLC
51 Jefferson Blvd, Suite 2
Warwick, RI 02888
Tel: 401.461.7700
Fax: 401.633.7511

/s/ Todd Dion, Esq.
Todd Dion, Esq.
Law Office of Todd S. Dion
1599 Smith Street
North Providence, RI 02911
Tel: (401) 270-0639

Dated: April 8, 2016